

**United Energy**  
**2021-2026 Price Reset**  
**Confidentiality Claim**

**1.1 Confidentiality template**

**United Energy** sets out below the completed Confidentiality template in respect of this regulatory proposal in accordance with the AER's *Better Regulation Confidentiality Guideline* dated August 2017 (**Confidentiality Guideline**).

Title, page and paragraph number of document containing the confidential information	Description of the confidential information.	Topic the confidential information relates to (e.g. capex, opex, the rate of return etc.)	Identify the recognised confidentiality category <sup>1</sup> that the confidential information falls within.	Provide a brief explanation of why the confidential information falls into the selected category.  If information falls within 'other' please provide further details on why the information should be treated as confidential.	Specify reasons supporting how and why detriment would be caused from disclosing the confidential information.	Provide any reasons supporting why the identified detriment is not outweighed by the public benefit (especially public benefits such as the effect on the long term interests of consumers).
<b>Attachments to the revised proposal</b>						
UE RRP BUS 9.01 - Security of critical infrastructure - Jan2020 – Confidential (pp. 2, 5, 6, 8, 9, 10, 12-24)	Costs quoted by competing service providers	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing estimates	Disclosing price estimates would undermine the competitive tendering process. Vendor documents prohibit disclosure without prior consent.	The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.  The public version of the model provides sufficient information for customers to understand the magnitude of the total cost.
UE RRP BUS 8.01 - Burwood depot replacement - Dec2020 – Confidential (pp. 4, 8, 9, 10, 12, 13)	Reason for need to relocate Burwood depot and proposed location of replacement depot	Capex	Other	Includes market sensitive information	Disclosing the information would impact market processes	The detriment to customers of undermining market processes outweighs the public benefit from disclosure of the information at this point in time.  The public version of the business case provides sufficient information for customers to

<sup>1</sup> Refer to table below

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							understand the magnitude of the total cost.
UE RRP ATT40 - Nov2020 - Burwood depot - Confidential	Reason for need to relocate Burwood depot	Capex	Other	Includes market sensitive information	Disclosing the information would impact competitive market processes		The detriment to customers of undermining market processes outweighs the public benefit from disclosure of the information at this point in time.
UE RRP ATT55 - B2B - Keysborough project and construction management high level estimate - Aug2020 – Confidential (entire document)	Price estimates from service provider	Capex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing estimates	Disclosing price estimates would undermine the competitive tendering process.		The detriment to customers of undermining competitive market processes outweighs the public benefit from disclosure of the information.  The public business case provides sufficient information for customers to understand the magnitude of the total cost.
UE RRP ATT51 - B2B - Burwood project and construction management budget estimate - Oct2020 – Confidential (entire document)	Price estimates from service provider	Capex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing estimates	Disclosing price estimates would undermine the competitive tendering process.		The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.  The public business case provides sufficient information for customers to understand the magnitude of the total cost.
UE RRP ATT53 - JMA Architects - Keysborough site concept plan - Aug2020 – Confidential (entire document)	Site concept plans	Capex	Market sensitive cost inputs and market intelligence	Includes market sensitive information	Disclosing concept plans would undermine the competitive tendering process.		The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.  The public business case provides sufficient information for customers to understand the

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						magnitude of the total cost.
UE RRP ATT54 - JMA Architects - Keysborough office concept plan - Aug2020 – Confidential (entire document)	Site concept plans	Capex	Market sensitive cost inputs and market intelligence	Includes market sensitive information	Disclosing concept plans would undermine the competitive tendering process.	<p>The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.</p> <p>The public business case provides sufficient information for customers to understand the magnitude of the total cost.</p>
UE RRP BUS 9.05 - Insurance - Dec2020 – Confidential (partial – pages: 20, 21, 22, 23, and 24)	Actual insurance coverage stack, including insurers and cost of each stack	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing and insurance providers	Disclosing prices and make up of insurance stack would undermine the competitive tendering process.	<p>The detriment to customers of undermining competitive market processes outweighs the public benefit from disclosure of the information.</p> <p>The public version of the business case provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.</p>
UE RRP ATT46 - Insurance invoice 2018/19 - Oct2018 – Confidential (entire document)	Actual insurance premiums and insurer	Opex	Market sensitive cost inputs and market intelligence	Includes market sensitive pricing and insurance providers	Disclosing prices and insurance providers would undermine the competitive tendering process.	<p>The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.</p> <p>The public version of the business case provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.</p>

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<p>UE RRP ATT47 - Insurance invoice 2019/20 - Oct2019 – Confidential (entire document)</p>	<p>Actual insurance premiums and insurer</p>	<p>Opex</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Includes market sensitive pricing and insurance providers</p>	<p>Disclosing prices and insurance providers would undermine the competitive tendering process.</p>	<p>The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.  The public version of the business case provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.</p>
<p>UE RRP ATT48 - Insurance invoice 2020/21 - Oct2020 – Confidential (entire document)</p>	<p>Actual insurance premiums and insurer</p>	<p>Opex</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Includes market sensitive pricing and insurance providers</p>	<p>Disclosing prices and insurance providers would undermine the competitive tendering process.</p>	<p>The detriment to customers of undermining competitive market process outweighs the public benefit from disclosure of the information.  The public version of the business case provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.</p>
<p>UE RRP ATT49 - Insurance invoice primary 2020/21 - Oct2020 – Confidential (entire document)</p>	<p>Actual insurance premiums and insurer</p>	<p>Opex</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Includes market sensitive pricing and insurance providers</p>	<p>Disclosing prices and insurance providers would undermine the competitive tendering process.</p>	<p>The detriment to customers of undermining competitive market process outweighs the public benefit from disclosure of the information.  The public version of the business case provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.</p>

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<p>UE RRP ATT50 - Premiums forecasting report - Nov2020 – Confidential (pp.2, 3, 6, 7, 8, 14)</p>	<p>Actual insurance coverage stack, including insurers and cost of each stack</p>	<p>Opex</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Includes market sensitive pricing and insurance providers</p>	<p>Disclosing prices and make up of insurance stack would undermine the competitive tendering process.</p>	<p>The detriment to customers of undermining competitive market processes outweighs the public benefit from disclosure of the information.  The public version of the business case provides sufficient information for customers to understand the reasons for proposed step change and magnitude of the total cost.</p>
<p><b>Models</b></p>						
<p>UE RRP MOD 9.01 - Step changes - Jan2020 – Confidential (1 worksheet: ‘Security of Critical Infr’)</p>	<p>Costs quoted by competing service providers</p>	<p>Opex</p>	<p>Market sensitive cost inputs and market intelligence</p>	<p>Includes market sensitive pricing estimates</p>	<p>Disclosing price estimates would undermine the competitive tendering process. Vendor documents prohibit disclosure without prior consent.</p>	<p>The detriment to customers of undermining competitive tender processes outweighs the public benefit from disclosure of the information.  The public version of the model provides sufficient information for customers to understand the magnitude of the total cost.</p>

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#### Confidentiality category

A NSP must categorise the confidential information into one of the following confidentiality categories:

- *Information affecting the security of the network* - information which, if made public, may jeopardise security of the network or a NSP's ability to effectively plan and operate its network.
- *Market sensitive cost inputs* - information such as supplier prices, internal labour costs, and information which would affect the NSP's ability to obtain competitive prices in future infrastructure transactions, such as tender processes.
- *Market intelligence* - information which may provide an advantage to a NSP's competitors for non-regulated or contestable activities.
- *Strategic information* – information such as the acquisition of land and easements, where the release of this information might adversely impact the NSP's ability to negotiate a fair market price for these items.
- *Personal information* - information about an individual or customer whose identity is apparent, or can reasonably be ascertained from the information which raises privacy considerations.
- *Other* - information which the NSP claims is confidential but does not fit into one of the above categories.

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**1.2 Proportion of confidential material**

Submission Title	Number of pages of submission that include information subject to a claim of confidentiality	Number of pages of submission that do not include information subject to a claim of confidentiality	Total number of pages of submission	Percentage of pages of submission that include information subject to a claim of confidentiality	Percentage of pages of submission that do not include information subject to a claim of confidentiality
<b>TOTAL</b>	<b>72</b>	<b>1475</b>	<b>1547</b>	<b>5%</b>	<b>95%</b>

Note: This notice is an approximate indication of the proportion and comparative proportion of material in United Energy’s revised regulatory proposal that is subject to a claim of confidentiality compared to what is not.

United Energy consents to the AER disclosing all United Energy’s non-confidential information on the AER website.